

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

	X
	:
<i>In re</i>	:
	:
THE FINANCIAL OVERSIGHT AND	: PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	: Title III
	:
as representative of	:
	: Case No. 17-BK-3283 (LTS)
	:
THE COMMONWEALTH OF PUERTO RICO,	: (Jointly Administered)
<i>et al.</i> , <sup>1</sup>	:
	:
Debtors.	:

	X
	:
<i>In re</i>	:
	:
THE FINANCIAL OVERSIGHT AND	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	Title III
	:
	:
as representative of	Case No. 17-BK-04780 (LTS)
	:
PUERTO RICO ELECTRIC POWER	<b>Court Filing Relates Only to PREPA</b>
AUTHORITY (PREPA),	:
	:
Debtor.	:

**NOTICE OF WITHDRAWAL OF URGENT MOTION OF CORTLAND  
CAPITAL MARKET SERVICES LLC, AS ADMINISTRATIVE AGENT,  
AND SOLUS TO COMPEL DISCOVERY RESPONSES IN  
CONNECTION WITH PREPA RSA SETTLEMENT MOTION**

The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

On August 2, 2019, Cortland Capital Market Services LLC (“Cortland”), as successor administrative agent for lenders under the Credit Agreement, dated as of May 4, 2012, among the Puerto Rico Electric Power Authority (“PREPA”), Scotiabank, and the lenders party thereto, and SOLA LTD, Solus Opportunities Fund 5 LP, Ultra Master LTD and Ultra NB LLC (collectively, “Solus”), as lenders to PREPA under the Trade Finance Facility Agreement, dated as of July 20, 2012, among PREPA and Citibank, N.A., as predecessor to the existing lenders thereunder, filed their *Urgent Omnibus Motion to Compel Discovery Responses in Connection with PREPA RSA Settlement Motion* [Dkt. No. 1557] (the “Motion to Compel”). The Motion to Compel sought to compel production of documents and Rule 30(b)(6) deposition testimony from the Financial Oversight and Management Board for Puerto Rico, PREPA, and the Puerto Rico Fiscal Agency and Advisory Authority (collectively, the “Government Parties”), concerning PREPA’s *Conditional Motion to Make an Offsetting Change in Base Rate Charges* (the “Rate Motion”), which was filed recently with the Puerto Rico Energy Bureau.

Cortland, Solus and the Government Parties have reached tentative agreement concerning the Government Parties’ document productions relating to the Rate Motion, subject to further discussions regarding search criteria, and have agreed to defer discussions of Cortland and Solus’s requests for Rule 30(b)(6) depositions concerning the Rate Motion until after the Government Parties have completed their document productions. Cortland and Solus reserve rights to seek relief from the Court in the event they are unable to reach agreement with the Government Parties regarding any unresolved issues, including deposition testimony.

Accordingly, PLEASE TAKE NOTICE THAT Cortland and Solus hereby withdraw the Motion to Compel without prejudice.

Dated: August 19, 2019

Respectfully submitted,

/s/ Nayuan Zouairabani

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